

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|----------------------------|---|----------------------|
| EMC CORPORATION, EMC |) | |
| INTERNATIONAL COMPANY, and |) | |
| EMC INFORMATION SYSTEMS |) | |
| INTERNATIONAL, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C.A. No. 13-1985-RGA |
| |) | |
| PURE STORAGE, INC., |) | REDACTED: |
| |) | |
| Defendant. |) | PUBLIC VERSION |
| |) | |

**DECLARATION OF LAURA B. STAMM IN IN SUPPORT OF
DEFENDANT PURE STORAGE, INC.'S OPPOSITION TO OPPOSITION TO
PLAINTIFFS' MOTION TO PARTIAL SUMMARY JUDGMENT, AND EXCLUDE
EXPERT TESTIMONY REGARDING NON-INFRINGEMENT ALTERNATIVES**

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October 28, 2015

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I, LAURA B. STAMM, declare as follows:

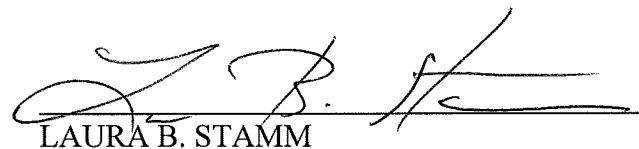
1. I submit this Declaration in this case on behalf of Defendant Pure Storage, Inc. (“Pure”). I have personal knowledge of the facts set forth herein, and if called upon as a witness, I could testify to them competently under oath.

2. I am Managing Principal at Analysis Group. I was retained as an independent expert by counsel to Pure to investigate and to offer opinions with respect to the damages claims advanced by Plaintiffs EMC Corporation, EMC International Company, and EMC Information Systems International (collectively “EMC”) in the above-captioned litigation.

3. I hereby adopt in full, under penalty of perjury, the analyses and opinions in my rebuttal expert report regarding damages (a true and correct copy of excerpts are attached hereto, **under seal, as Exhibit A**).

4. In my rebuttal expert report regarding damages, I use a citation format common in my field to indicate the source of the information or opinions on which I am relying. In the body of my report, when I wish to indicate that I learned the information or opinion from someone else, I typically state “I understand,” followed by the information or an opinion I learned. I then indicate the source of the information or opinion in a footnote to the sentence. In this manner, I have disclosed the material contents of discussions with Pure’s technical expert witnesses and employee engineers on which I relied in forming my opinions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration was executed on October 26, 2015, in Boston, Massachusetts.


LAURA B. STAMM

CERTIFICATE OF SERVICE

I, David M. Fry, hereby certify that on October 28, 2015, this document was served on the persons listed below in the manner indicated:

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Exhibit A

Filed Under Seal

REDACTED IN ITS ENTIRETY